

REMARKS

Claims **1-24, 33, and 34** are pending.

Claims **1-24, 33, and 34** stand rejected.

Claims **1, 4, 5, 9, 33, and 34** have been amended. No new matter has been added. Support for the amendments can be found, at least, within paragraph [0026] of the specification. Support for the amendments to claim 34 can be found, at least, within paragraph [0029] of the specification.

Claims **35 and 36** have been added. Support for the limitations of claims 35 and 36 can be found, at least, within paragraphs [0026]-[0030] of the specification, as well as Figures 3A and 3B therein.

Specification Objections

Claims 33 and 34 stand objected to under 35 U.S.C. § 132(a) because new matter is purportedly introduced thereby. Without conceding the propriety of this rejection, but rather in the interest of advancing prosecution, Applicants have amended these claims to address the Examiner's concerns.

Rejection of Claims under 35 U.S.C. § 112

Claims 1-24, 33, and 34 stand rejected under 35 U.S.C. § 112, first paragraph, as purportedly failing to comply with the written description requirement. Without agreeing with this rejection, but rather in the interest of advancing prosecution, Applicants have amended the independent claims to address the Examiner's concerns. Applicants respectfully submit that support for the following claimed limitation (as amended),

extracting the source inventory location information from a plurality of source
inventory location records, wherein
at least one of the plurality of source inventory location records is
extracted from a first source system,
at least one of the plurality of source inventory location records is
extracted from a second source system,

can be found, at the very least, within paragraph [0026] of the specification, reciting, “the facility extracts inventory location information from one or more source systems.” Where the recited facility has been earlier referred to in the specification as the system for automatically converting inventory location information. *See* Specification, ¶ [0017].

Rejection of Claims under 35 U.S.C. §103

Claims 1-24 and 33-34 are rejected under 35 U.S.C. 103(a) as purportedly being unpatentable over U.S. Patent No. 5,708,828 (“Coleman”) in view of U. S. Patent No. 5,446, 880 (“Balgeman”), and further in view of U.S. Patent Publication No. 2002/0178077 (“Katz”). Applicants respectfully traverse this rejection.

Applicants respectfully submit that Coleman, Balgeman, and Katz, alone or in any combination, fail to teach or suggest, all the elements of independent claim 1, including at the very least, (1) extracting source inventory location information from a plurality of source inventory location records, where (a) at least one of the plurality of source inventory location records is from a first source system, and (b) at least one of the plurality of source inventory location records s from a second source system . Independent claims 9 and 33 recite comparable limitations.

As an initial matter, Applicants respectfully submit that the Office Action (correctly) cites neither Balgeman nor Katz as disclosing any features that might somehow be related to the claimed extracting limitation, and there references are therefore not relevant to the amended extracting limitation. Further, Applicants respectfully submit that no such disclosure is, in fact, provided by either Balgeman or Katz.

The Office Action cites Coleman as purportedly disclosing the unamended version of the claimed extracting limitation. *See* Office Action, p. 6 (citing Coleman Abstract, Figure 2B, Figure 3, and 1:9-13). Coleman discloses simply that data can be converted between different hardware and software platforms. *See* Coleman Abstract. However, Coleman fails to contemplate anything comparable to extracting any information from a plurality of source inventory location records before converting that information into target inventory location information, particularly in the manner claimed. In other words, Coleman performs simple conversions one at a time and, as one would expect, is completely silent on any method for extracting information from

multiple source systems before converting the extracted information into a format compatible with a target system. This is particularly true where an integration server supports a data integration operation that includes such extraction, as well as subsequent multiple conversions, which results in the integration of source inventory location information from multiple source systems into existing target inventory location information. (*See, e.g.*, Specification, ¶¶ [0028] and [0030])

The remaining cited sections of Coleman also fail to provide any support for the claimed extracting. Coleman's Figures 2B and 3 only provide Coleman's approach to system organization for supporting the above-discussed single-source data conversion. Similarly, column 1, lines 9-13, of Coleman disclose the ability to convert from a number of different formats, with no mention (or even recognition) of extracting source inventory location information from a plurality of source inventory location records, as claimed.

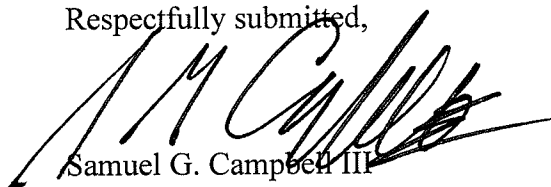
For at least these reasons, Applicants submit that neither Coleman nor Balgeman nor Katz, alone or in combination, provide disclosure of all the limitations of independent claims 1, 9, and 33, and all claims depending therefrom, and that these claims are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims.

CONCLUSION

Applicants submit that all claims are now in condition for allowance, and an early notice to that effect is earnestly solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is requested to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicants hereby petition for such extensions. Applicants also hereby authorize that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Samuel G. Campbell III', is written over the typed name.

Samuel G. Campbell III
Attorney for Applicants
Reg. No. 42,381
512-439-5084 (direct)
512-439-5099 (fax)